

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION

C.J., a minor, by and through her )  
next friend and guardian, BETTY )  
JEAN MURPHY JAMES, )

and )

BETTY JEAN MURPHY JAMES, )  
as Administrator of the Estate of )  
Latoya James )

Plaintiffs, )

v. )

MICHAEL BLAQUIERE, in his )  
individual capacity, as Camden County )  
Deputy Sheriff )

and )

DOWNY CASEY, in his individual )  
capacity, as a Camden County Deputy )  
Sheriff )

and )

JOHN/JANE DOES, in their individual )  
capacities, as Camden County Deputies )

Defendants. )  
\_\_\_\_\_ )

CIVIL ACTION  
FILE NO.: 2:22-CV-00078-LGW-BWC

**DEFENDANTS MICHAEL BLAQUIERE AND DOWNY CASEY'S**  
**MOTION FOR SUMMARY JUDGMENT**

COME NOW Michael Blaquiere and Downy Casey, in their individual capacities, (“Defendants”) hereby respectfully move this Court for summary judgment as to all of plaintiff’s remaining claims against these defendants.

In support of this motion, defendants incorporate by reference their Statement of Undisputed Material Facts in Support of their Motion for Summary Judgment, Memorandum of Law in Support of their Motion for Summary Judgment and the exhibits annexed thereto, including the facts submitted in the pleadings and discovery, and all pleadings and discovery of record at the time of the Court's consideration of this motion.

**WHEREFORE**, defendants seek their motion for summary judgment be granted.

This 27th day of November, 2023.

Respectfully submitted,

**FREEMAN MATHIS & GARY, LLP**

/s/ Steven L. Grunberg

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically submitted the foregoing **DEFENDANTS**  
**MICHAEL BLAQUIERE AND DOWNY CASEY'S MOTION FOR SUMMARY**  
**JUDGMENT** to the Clerk of Court using the CM/ECF system which will automatically send  
electronic mail notification of such filing to counsel of record who are CM/ECF participants.  
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This 27th day of November, 2023.

/s/ Steven L. Grunberg

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